



LOS ANGELES
REGIONAL OFFICE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
444 SOUTH FLOWER STREET, SUITE 900
LOS ANGELES, CA 90071

January 16, 2025

By ECF

The Honorable Victor Marrero
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Securities and Exchange Commission v. Ignite International Brands, Ltd., et al.,
No. 1:24-cv-07331-VM

Dear Judge Marrero:

The parties jointly request that Defendants' deadline to file a response to the SEC's complaint be extended about six weeks, from January 22, 2025, to March 5, 2025. This is the first extension request for Defendants Ignite International Brands, Ltd., Paul Bilzerian, Paul Dowdall, and International Investments, Ltd., who are all located outside the United States, and the second request for Defendants John Schaefer and Scott Rohleder.

The SEC filed its Complaint on September 27, 2024. The SEC served Mr. Rohleder on October 17, 2024 (ECF No. 7), and all other Defendants waived service. On October 29, 2024 (ECF No. 15), and November 12, 2024 (ECF No. 18), the Court extended the deadline for Messrs. Schaefer and Rohleder to respond to the complaint to January 22, 2025, to coincide with the original deadline for Defendants Ignite, Mr. Bilzerian, Mr. Dowdall, and International Investments. On December 20, 2024, the Court entered final judgments (ECF Nos. 24 & 25) against Defendants Accell Audit & Compliance, PA, and Christopher Hiestand.

On January 13, 2025, the counsel for the SEC and Defendants Ignite, International Investments, and Messrs. Bilzerian, Schaefer, and Dowdall held an in-person meeting in Los Angeles, California, to discuss the SEC's allegations, procedural and timing issues in a parallel criminal action against some Defendants, *United States v. Bilzerian*, 2:24-cr-00569-MEMF (C.D. Cal. filed Sept. 26, 2024), and a potential resolution of this action.

Given the upcoming deadlines in the pending parallel criminal action and the potential for a resolution of this action, Defendants request an additional six weeks to

respond to the complaint. The SEC joins in this request. The requested extension does not affect any other deadline or any court appearance in this action.

Respectfully submitted,

/s/ Charles E. Canter

Charles E. Canter

Trial Counsel

*Counsel for Securities and
Exchange Commission*

/s/ Ashwin Ram

Ashwin Ram

STEPTOE LLC

*Counsel for Defendants Ignite International
Brands, Ltd, Paul Bilzerian, Paul Dowdall,
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/s/ Daniel Cevallos

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